

## **Public Comment Period on the Draft Post-Closure Permit**



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the California  
Environmental  
Protection Agency.  
The Department's  
mission is to restore,  
protect and enhance  
the environment,  
to ensure public health,  
environmental  
quality and  
economic vitality,  
by regulating  
hazardous waste,  
conducting and  
overseeing  
cleanups, and  
developing  
and promoting  
pollution prevention.*

State of California



California  
Environmental  
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### **INTRODUCTION**

The California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) has prepared this fact sheet to update you on the status of final post-closure and remediation activities at the IT Corporation (IT) Panoche hazardous waste facility. The facility is located on Lake Herman Road, near the city of Benicia. IT has completed a post-closure permit application and finalized designs for remaining groundwater remediation efforts in the vicinity of former Drum Burial Area V (DBA V). The post-closure permit application and draft permit are now available for public comment.

### **PUBLIC COMMENT PERIOD AND PUBLIC HEARING**

The public comment period for this post-closure permit begins on Friday, April 4, 2003 and ends on Monday, May 19, 2003. Written comments must be postmarked by Monday, May 19, 2003, and sent to:

Raymond Leclerc, P.E.  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, CA 95826  
[rleclerc@dtsc.ca.gov](mailto:rleclerc@dtsc.ca.gov)

Additionally, DTSC has decided to hold a public meeting and hearing for the draft permit. The purpose of the meeting is to discuss the draft permit. After the meeting portion is complete, a formal hearing will be convened to accept public comments on the draft post-closure permit. That meeting and hearing will be held on April 30, 2003, at the Benicia Public Library, 150 East "L" Street, Benicia, California 94510.

Before making a final permit determination, DTSC will review and respond to all public comments in writing in the Response to Comments. Those who submitted comments and those who request a copy will receive the Response to Comments. A copy will also be placed in the information repositories listed in this fact sheet. The final permit determination will be public noticed in the Benicia Herald.

## BACKGROUND

The IT Panoche facility is located on Lake Herman Road in an unincorporated portion of Solano County, two miles northeast of Benicia, California. The disposal site occupies approximately 248 acres and received wastes between 1968 and 1986. IT took over active waste disposal operations in 1975. In November 1988, IT commenced formal closure of the Panoche facility by submitting Closure and Post-Closure Plans to the Department of Health Services (predecessor to DTSC). The Closure Plan was approved by DTSC on March 16, 1998. IT completed closure construction activities specified in the Closure Plan in the fall of 2000. A post-closure permit application was submitted in February 2003 and is available, along with a draft permit, for public review. DTSC intends to approve the post-closure permit in June of 2003.

In parallel with closure construction and the draft post-closure permit, IT has also continued with investigation and remediation activities for DBA V, pursuant to a Corrective Action Consent Agreement issued by DTSC. DBA V is an area on the northwest edge of the facility that was used for drum and container disposal during the late 1970s and early 1980s. Releases of volatile organic compounds (VOC) and other waste constituents to groundwater, have led to DTSC requirements for substantial investigation and remedial actions in this specific area. Initial remediation efforts were completed between 1997 and 2000, including installation of groundwater controls, waste removal, and permanent cover system construction.

IT has conducted a number of technical studies to characterize DBA V and the surrounding areas, and identify and evaluate

additional measures necessary to more fully remediate the area. A Remedy Decision (RD) was issued in June of 2001 that evaluated and selected additional elements of a final remedial approach. Based on the RD, IT conducted additional investigation/design work and began construction in fall of 2002. In September of 2002, DTSC approved a Corrective Measures Implementation Plan.

## PRIOR FACILITY CLOSURE ACTIVITIES

The primary activities associated with implementing the Closure Plan at the IT Panoche facility included:

- Removal and relocation of waste materials and contaminated subsoils from certain waste management units (WMU) around the permitted site boundary to the central drainage area of the facility,
- Removal and relocation of waste materials disposed in four on-site drum burial areas (DBA),
- Development of “borrow areas” for obtaining clean native soils to be used in the construction of the final closure covers, followed by reclamation of these soil excavation areas,
- Placement of the final closure covers over all areas where waste materials are or were previously located (approximately 110 acres),
- Construction of surface water drainage ditches and erosion control measures, and
- Contaminated groundwater containment and removal, and management onsite in tanks, surface impoundments and solar evaporators.

Following completion of closure construction, IT submitted as-built reports and a closure certification in February of 2001. DTSC approved these as-builts in September 2001 and certified the Panoche Facility closure on March 28, 2003.

## **DRAFT POST-CLOSURE PERMIT**

Since closure construction was completed, IT has continued with various technical studies intended to assist DTSC in finalizing a long-term monitoring and maintenance program for the facility. Results of these technical studies have been utilized in development of a post-closure permit application submitted to DTSC on February 27, 2003. The application includes significant detail on how IT will manage the facility during the ongoing post-closure period. Information on post-closure operations includes:

- Recordkeeping,
- Groundwater and surface water monitoring programs,
- Surface water control systems management,
- Groundwater recovery systems and liquids management operations,
- Post-closure inspection and maintenance,
- Air emissions monitoring,
- Management of a long-term solids disposal unit for site-generated wastes,
- Annual third party inspection and reporting, and
- Contingency procedures.

## **DRUM BURIAL AREA V**

DBA V was located in the northwest portion of the IT Panoche facility (see Figure 1). Prior to facility closure, IT installed a number of groundwater collection and removal system components downgradient of this area to control the movement of contaminants. During the summer of 1998, over 4,000 drums and containers, along with 32,000 cubic yards of soil, were removed from DBA V trenches and placed in the Area 5 Landfill. As the removal of drums and subsoils was completed, soil from the bottom of the trench was sampled at 100-foot intervals and analyzed, and the excavations backfilled with the clean native soil. At the conclusion of the excavation effort, DBA V and the Area 5 Landfill were covered with permanent covers as part of overall facility closure construction.

Since completion of the drum removal project, IT has performed further remedial investigations of both soils and groundwater and completed an evaluation of potential additional corrective actions. An RD was issued in June of 2001 that evaluated and selected additional elements of a final remedial approach. Based on the RD, IT conducted additional investigation/design work and began construction in fall of 2002. In September of 2002, DTSC approved a Corrective Measures Implementation Plan. The plans include the following:

- Enhancements to the groundwater control system at the IT property boundary west of DBA V,
- Installation of a deep groundwater recovery trench west of DBA V (referred to as the Source Area Containment System or SACS) to contain the inferred plume of dense non-aqueous phase

liquids and removed impacted groundwater,

- Installation of a Soil Vapor Extraction (SVE) system to removed volatile organic compounds (VOC) from the subsurface.
- Construction of a treatment plant to remove VOCs from groundwater and the air removed by the SVE system.

In late 2002, initial efforts to implement certain of these measures commenced. IT and its contractor have since reevaluated installation methodology and expect to remobilize and complete these tasks commencing in the spring of 2003.

## ENVIRONMENTAL REVIEW UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

In compliance with the California Environmental Quality Act (CEQA), DTSC has reviewed the proposed post-closure activities and determined that they are exempt from CEQA and will not have an adverse effect on public health and the environment. Therefore, DTSC has prepared a Notice of Exemption (NOE). The NOE is part of the administrative record for this project and a copy will be placed in the information repositories listed in this fact sheet.

## FOR MORE INFORMATION

If you have any questions regarding the closure completion, the post-closure permit, or DBA V remediation activities at the IT Panoche facility, please contact the

following DTSC representatives who will be glad to assist you:

### **Raymond Leclerc, P.E.**

Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, CA 95826  
[rleclerc@dtsc.ca.gov](mailto:rleclerc@dtsc.ca.gov)  
(916) 255-3582

### **Randy Sturgeon**

Public Participation Specialist  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, CA 95826  
[rsturgeo@dtsc.ca.gov](mailto:rsturgeo@dtsc.ca.gov)  
(916) 255-3649

The Draft Post-Closure Permit and Post-Closure Permit Application, RD, and other site-related documents are available for public review in the information repositories listed below. The entire administrative record is available at the DTSC listed office. The administrative record includes copies of the post-closure permit application, Closure /Post-closure plans, the CEQA Notice of exemption and other specific documents.

Benicia Public Library  
150 East "L" Street  
Benicia, California 94510  
(707) 746-4343

Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, CA 95826  
Contact: Ray Leclerc at (916) 255-3582

## Hearing Impaired

You can obtain additional information by using the California State Relay Service at 1-888-877-5378 (TDD). Ask them to contact Ray Leclerc at (916) 255-3582 regarding the IT Panoche Facility.

## Mailing List

If you did not received this fact sheet in the mail and would like to be on the IT Panoche mailing list please fill out the information below and mail it to Randy Sturgeon, DTSC Sacramento Office, 8800 Cal Center Drive, Sacramento, California, 95826. DTSC mailing lists are solely for the purpose of keeping persons informed of DTSC activities. Mailing lists are not routinely released to outside parties. However, they are considered public records, and, if requested, may be subject to release.

Name:

Address:

City, State, Zip Code

Phone Number:

Fax Number:

E-Mail: